

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 20-14495**
Andrew R Gross : **Chapter 13**
: **Judge Magdeline D. Coleman**
Debtor(s) : *********

RESPONSE OF WELLS FARGO BANK, N.A. TO THE MOTION TO MODIFY PLAN
(DOCKET NUMBER 69)

Wells Fargo Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the currently proposed Second Motion to Modify Plan ("Motion") filed by Andrew R Gross ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 325 Peachtree Drive, Jenkintown, PA 19046-5002 ("Property").
2. Creditor has filed Proof of Claim number 6-2 in the amount of \$204,843.45.
3. The Modified Plan accompanying Debtor's Motion fails to provide for Creditor's secured claim.
4. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim.

WHEREFORE, Creditor respectfully requests that the Court deny the Debtor's currently proposed Motion to Modify Plan.

Respectfully submitted,

/s//Alyk L. Oflazian

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Attorneys for Creditor

The case attorney for this file is Alyk L.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A. to the Motion to Modify Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, Office of the Chapter 13 Standing Trustee, 1234 Market Street - Suite 1813, Philadelphia, PA 19107, ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Andrew R Gross, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on January ²⁸, 2022:

Andrew R Gross, 325 Peach Tree Drive, Jenkintown, PA 19046

Wells Fargo Mortgage, PO Box 31557, Billings, MT 59107

DATE: 1/28/2022

/s/Alyk L. Oflazian

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Attorneys for Creditor
The case attorney for this file is Alyk L. Oflazian.
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